

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

HB Productions, Inc.,)	
)	Case No.: 1:19-cv-00487-JMS-KJM
Plaintiff,)	(Copyright)
vs.)	
)	AFFIDAVIT OF COUNSEL
Muhammad Faizan,)	
)	
Defendant.)	
)	
)	

AFFIDAVIT OF COUNSEL

KERRY S. CULPEPPER, hereby declares under penalty of law that the following is true and correct:

1. I am an attorney and represent the Plaintiff, I have personal knowledge of the matters stated herein, and this affidavit is given in support of Plaintiff's Rule 55(b)(1) Request for Clerk to enter Default Judgment Against Defendant Muhammad Faizan.

2. Upon information and belief, Muhammad Faizan is not a minor or an incompetent person and is not currently in the military service of the United States.

3. The certain sum of \$270,902.58 pleaded in the First Amended Complaint at paragraph 141 and pg. 33 is due to Plaintiff because of Defendant's infringements of Plaintiff's copyright in its motion picture *Hellboy*.

4. The certain sum of \$270,902.58 pleaded in the First Amended Complaint at paragraph 141 and pg. 33 was calculated by multiplying the number of instances of infringement in the United States logged by Plaintiff's agent by the price for purchasing a copy of the motion picture in Hawaii.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Kailua-Kona, Hawaii, March 4, 2020.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper